

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

)
Amendment of the Amateur Service)
Rules to Implement a Vanity Call)
Sign System.)

PR Docket No. 93-388

DOCKET FILE COPY ORIGINAL

To: The Commission

PETITION FOR PARTIAL RECONSIDERATION

The American Radio Relay League, Incorporated, (the League), the national non-profit association of amateur radio operators in the United States, by counsel and pursuant to Section 1.429 of the Commission's Rules (47 C.F.R. §1.429), hereby respectfully requests that the Commission reconsider and revise a single portion of its Report and Order, FCC 94-343, 60 Fed. Reg. 7459, et seq., released February 1, 1995, which established a vanity call sign assignment system. The one respect in which the League requests that the Commission modify that Report and Order is to require that the call sign requested by an applicant in the vanity call sign assignment system, other than applicants in Gate One,¹ must specify the call

¹ According to the Report and Order, the Commission intends to accept applications for vanity call signs in a series of "gates" to assure fairness in call sign administration. The first "gate" would be for applicants seeking to reobtain a call sign previously held by that applicant, and by applicants seeking the call sign of a deceased close family relative. Commission consideration of this Petition for Reconsideration should not, and the League believes it need not, delay the commencement of the Vanity Call Sign Program; the opening of Gate One; or the processing of applications received in that gate.

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sign region of the then-current mailing address of the applicant. As good cause for its Petition, the League states as follows:

1. The Commission is, first of all, to be highly commended for having initiated a program that is a great benefit to the Amateur Service. The amateur community realizes that this is a program that is not absolutely necessary for the basic functioning of the Service, but it is a good example of the Commission's responsiveness in providing a service that is highly desirable to a significant number of licensees. The vanity call sign program is being extremely well-received by the amateur community. We greatly appreciate the program, and the signal it sends to the licensees that the Commission supports the Amateur Service and its public service communications efforts.

2. There is but one respect in which the Commission departed in this proceeding from the suggestion of a number of commenters, and, based on the number of amateurs who have expressed concern about it since the release of the Report and Order, the League suggests that the Commission revisit that one matter now. The vanity call sign program, as set forth in the Report and Order, would permit a licensee to apply for a call sign from any call area block, or a call sign block dedicated to specific island and insular areas, which have traditionally, in general, signified a station location in a specific geographical area. For many years, the Commission's sequential call sign assignment system has been configured such that the mailing address of the license determines what call sign prefix is assigned by the Commission to the

licensee. While the licensee may continue to hold the call sign if he or she moves to a different geographical region of the country², the system of call sign assignments is still based on the geographic region of the country where the licensee indicates that he or she receives mail.³ The details of the standard call sign assignment system are set forth in the Private Radio Bureau Fact Sheet #206, dated June, 1991 (a copy of which is attached hereto as Exhibit A).

3. The Report and Order, at Paragraph 10, stated as follows:

The ARRL prefers that an applicant be permitted to request only those call signs that are assignable to stations in the call sign region where the licensee resides (citation omitted). We have carefully considered this suggestion. We have decided, however, not to impose that limitation. Otherwise, the applicant's choice of vanity call signs would be reduced to ten percent or less of the call signs that would otherwise be assignable to the station. A limitation based upon the person's place of residence, moreover, could easily be circumvented by using a mailing address in another call sign region.

The Commission's stated concerns are certainly valid, but do not, in the opinion of the League and a significant number of amateurs, outweigh the benefits of a requirement that amateurs in gates 2,3 and 4 apply for call signs within the call area corresponding to their mailing addresses. Precisely because amateur call signs in preferred categories are in limited supply, it would be unfair for a licensee in one call area region to usurp a call sign in another

² Prior to 1978, if an amateur moved to a different region of the country, he or she had to change his or her call sign to reflect the call area region corresponding to the new mailing address.

³ See 47 C.F.R. §97.21.

region, thus depriving a licensee in the latter call area the opportunity to obtain a desired call sign that reflects his or her geographic location. More importantly, however, certain limited call sign banks, such as, for example, KP4, KL7 and KH6, would be depleted in short order, with those amateurs actually living in Puerto Rico, Alaska and Hawaii being deprived of the ability to have a specific call sign choice, if those call signs were available generally for specific selection. The uniqueness of the KP4, KL7 and KH6 call sign prefixes, as well as those of the more exotic United States possessions, such as KH4 and KP5, require special handling in terms of this program.

4. Therefore, other than with respect to formerly held call signs, or the call signs of deceased family members (the Gate One filers) the Commission should limit call sign choice within the available banks to those indicating the call area of the residence address of the applicant as well. This is justified both by the history of call sign assignments in the Amateur Service and by the practicalities of amateur communications. One of the reasons for the division of the United States into call sign districts initially was to assist the Commission in identification of the location of an emitter for enforcement purposes. While modern direction-finding techniques may have somewhat eroded the justification for the continuation of this practice, amateurs are in general most supportive of the use of call signs as a quick means of determining the general location of a station. It assists in determining propagation characteristics at a particular time,

and offers an immediate idea of how to adjust directional antennas for optimum communications with the lowest necessary power levels. It also, as a general principle, assists non-U.S. amateurs in determining generally the location of an amateur station. It is therefore more than justifiable to restrict choice of call signs generally to the geographic region of the residence of the amateur licensee. However, it would not be necessary to return to the former requirement that an amateur must change a vanity call sign simply because of a change in station location or mailing address to a different call area. Once a vanity call sign is assigned to an amateur, that call sign could be retained.

5. The Commission expressed concern that, to defeat the requirement and obtain a call sign from an area other than the primary residence (or mailing address) of the licensee, any amateur could simply specify a mailing address in the call area region corresponding to the call sign of choice, even if that person actually resides elsewhere. That is indeed a possibility. However, the person would actually have to be able to receive mail at that address on a continuing basis, and the Commission's new rules (47 C.F.R. §97.23, amended October 24, 1994) provide severe penalties for provision of an incorrect mailing address. If this rule does not inhibit such a practice, the practicalities of establishing a "mail drop" address would be a significant limiting factor. That same potential for abuse, of course, has long existed with respect to the sequential call sign system, and there appears little

indication of a problem, even though preferred call sign blocks in many call areas are exhausted, but not in others.

6. Because the current sequential call sign assignment system, and its predecessors, have adhered and will continue to adhere strictly to the regional call area system for assignments, there is no reason to depart from it in the vanity call sign system. Such a requirement would protect those scarce preferred call signs in a particular call area, so that those licensees in that call area might have a chance to obtain a call sign of choice reflecting their location through the vanity call sign program. Furthermore, it would protect against depletion of the limited call sign blocks assigned to Alaska, Hawaii, and Caribbean and Pacific insular areas, which are already in extremely short supply through assignment via the sequential call sign assignment system.

7. It is not the League's intention to delay whatsoever the implementation of the vanity call sign program by the filing, or Commission consideration, of this Petition for Reconsideration. However, the Commission has a significant amount of time to consider this petition before the opening of Gate Two in the Vanity Call Sign Assignment System, and the issue raised herein is relatively straightforward. There is some time before the program begins, in order for the form 610-V to be approved by OMB, and no one applying for a specific call sign in Gate One would be affected by the relief requested herein. Therefore, since the Commission would presumably be processing applications received in Gate One first, prior to accepting applications in Gate Two, this matter

could be resolved without any delay in the implementation of the program.

8. Nor do the rules adopted in the Report and Order require modification. The Commission need simply include, in the public notice(s) detailing the procedures of the vanity call sign system, referenced in the definition of the Vanity call sign system in Section 97.3(a)(11)(ii) of the Commission's Rules, the requirement that, except for filers in Gate One, all applicants for vanity call sign assignments must request call signs in the block corresponding to the call area region in which the applicant's license mailing address is located.

9. Other than this one change, the League heartily endorses the remainder of the Report and Order, and thanks the Commission for a job well done.

Therefore, the foregoing considered, the American Radio Relay League, Incorporated respectfully requests that the Commission reconsider and revise a single aspect of the Report and Order in this proceeding, to provide that applicants for vanity call signs, other than those seeking to obtain a call sign previously held by that licensee, or the call sign of a deceased close family member,

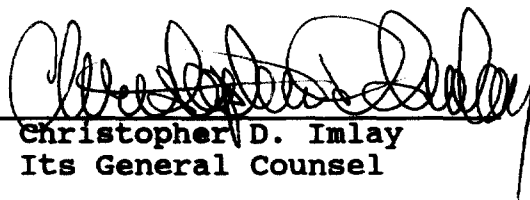
be required to apply for a call sign within the call area region which corresponds to the mailing address on the license of the applicant.

Respectfully submitted,

**THE AMERICAN RADIO RELAY
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March 3, 1995



Private Radio Bureau

FACT SHEET

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

PR-5000

June, 1991

Fact Sheet #206

AMATEUR STATION CALL SIGN ASSIGNMENT SYSTEM

A unique call sign is assigned to each amateur station during the processing of its license. A new call sign is sequentially selected from the alphabetized regional-group list for the licensee's operator class and mailing address. Each call sign has a one or two letter prefix and a one, two, or three letter suffix separated by a numeral indicating the geographic region. Certain combinations of letters are not used. When the call signs in any regional-group list are exhausted, the selection is made from the next lower group. The groups are:

Group A. For stations licensed to Amateur Extra Class operators.

Regions 0

through 9: Prefix K, N or W, and two letter suffix; two letter prefix with first letter A, K, N or W, and one letter suffix; two letter prefix with first letter A, and two letter suffix.

Region 11: Prefix AL, KL, NL, or WL, and one letter suffix.

Region 12: Prefix KP, NP, or WP, and one letter suffix.

Region 13: Prefix AH, KH, NH, or WH, and one letter suffix.

Group B. For stations licensed to Advanced Class operators.

Regions 0

through 9: Two letter prefix with letter K, N, or W, and two letter suffix.

Region 11: Prefix AL, and two letter suffix.

Region 12: Prefix KP, and two letter suffix.

Region 13: Prefix AH, and two letter suffix.

Group C. For stations licensed to General and Technician Class operators.

Regions 0

through 9: Prefix K, N, or W, and three letter suffix.

Region 11: Prefix KL, NL, or WL, and two letter suffix.

Region 12: Prefix NP or WP, and two letter suffix.

Region 13: Prefix KH, NH, or WH, and two letter suffix.

Group D. For stations licensed to Novice Class operators.

Regions 0

through 9: Prefix KA through KZ or WA through WZ, and three letter suffix.

Region 11: Prefix KL or WL, and three letter suffix.

Region 12: Prefix KP or WP, and three letter suffix.

Region 13: Prefix KH or WH, and three letter suffix.

-more-

The regions are:

- Region 1. Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont. The numeral is 1.
- Region 2. New Jersey and New York. The numeral is 2.
- Region 3. Delaware, District of Columbia, Maryland and Pennsylvania. The numeral is 3.
- Region 4. Alabama, Florida, Georgia, Kentucky, North Carolina, South Carolina, Tennessee and Virginia. The numeral is 4.
- Region 5. Arkansas, Louisiana, Mississippi, New Mexico, Oklahoma and Texas. The number is 5.
- Region 6. California. The numeral is 6.
- Region 7. Arizona, Idaho, Montana, Nevada, Oregon, Utah, Washington and Wyoming. The numeral is 7.
- Region 8. Michigan, Ohio and West Virginia. The numeral is 8.
- Region 9. Illinois, Indiana and Wisconsin. The numeral is 9.
- Region 10. Colorado, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota and South Dakota. The numeral is 0.
- Region 11. Alaska. The numeral is 7.
- Region 12. Caribbean Insular areas. The numeral 1 indicates Navassa Island; 2 indicates Virgin Islands; 4 indicates Commonwealth of Puerto Rico except Desecheo Island; and 5 indicates Desecheo Island.
- Region 13. Hawaii and Pacific Insular areas. The numeral 1 indicates Baker or Howland Island; 2 indicates Guam; 3 indicates Johnston Island; 4 indicates Midway Island; 5 indicates Palmyra or Jarvis Island; 5 followed by the letter K in the suffix indicates Kingman Reef; 6 indicates Hawaii except Kure Island; 7 indicates Kure Island; 8 indicates American Samoa; 9 indicates Wake, Wilkes or Peale Island; and 0 indicates the Commonwealth of Northern Mariana Islands.

No request for a specific call sign is granted. A call sign is only changed when the licensee requests a change by application (FCC Form 610, Item 2E). Each change in call sign is processed as a new call sign as detailed in paragraph 1. A station is reassigned its same call sign upon renewal or modification of its license, unless a call sign change is so requested. Because a call sign can be so reassigned only when the licensee information resides in the computer data base, the information is retained in the data base for two years beyond expiration to provide a grace period during which persons who unintentionally fail to renew their licenses have additional time to do so. An application filed beyond the grace period is processed for a new license because the record has been deleted from the data base.

For further information, contact the Consumer Assistance Branch at (717) 337-1212.

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- Region 1. Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont. The numeral is 1.
- Region 2. New Jersey and New York. The numeral is 2.
- Region 3. Delaware, District of Columbia, Maryland and Pennsylvania. The numeral is 3.
- Region 4. Alabama, Florida, Georgia, Kentucky, North Carolina, South Carolina, Tennessee and Virginia. The numeral is 4.
- Region 5. Arkansas, Louisiana, Mississippi, New Mexico, Oklahoma and Texas. The number is 5.
- Region 6. California. The numeral is 6.
- Region 7. Arizona, Idaho, Montana, Nevada, Oregon, Utah, Washington and Wyoming. The numeral is 7.
- Region 8. Michigan, Ohio and West Virginia. The numeral is 8.
- Region 9. Illinois, Indiana and Wisconsin. The numeral is 9.
- Region 10. Colorado, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota and South Dakota. The numeral is 0.
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